

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ELIEZER L. ADLER,

Plaintiff,

-against-

ZENITH ACQUISITION CORP.,

Defendant(s).

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ANSWER

11 CV 5894
(Amon, J.)

Defendant, ZENITH ACQUISITION CORP., by its attorney,
MEL S. HARRIS AND ASSOCIATES, LLC, answers plaintiff's complaint as
follows:

1. Defendant acknowledges being sued pursuant to Federal and
State Law, but denies any violation thereof.

2. Defendant denies knowledge and information sufficient to
form a belief as to the allegations contained in paragraph "2" of the
complaint.

3. Defendant denies knowledge and information sufficient to
form a belief as to the allegations contained in paragraph "3" of the
complaint.

4. Defendant admits the allegations contained in paragraph
"4" of the complaint.

5. Defendant admits the allegations contained in paragraph
"5" of the complaint.

6. Defendant admits the allegations contained in paragraph
"6" of the complaint.

7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant admits the allegations contained in paragraph "9" of the complaint.

10. Defendant denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies each and every allegation contained in paragraph "17" of the complaint.

18. Defendant denies each and every allegation contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. Defendant denies each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

WHEREFORE, the Defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
January 24, 2012



Arthur Sanders (AS1210)
MEL S. HARRIS AND ASSOCIATES, LLC
Attorneys for Defendant
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TO:

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